

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: Mai T. Nguyen aka Mai Thanh Nguyen aka Mai
Nguyen

Debtors

JPMorgan Chase Bank, National Association

Movant

vs.

Mai T. Nguyen aka Mai Thanh Nguyen aka Mai Nguyen

Debtors

Charles J. DeHart, III Esq.

Trustee

CHAPTER 13

NO. 15-00929 MDF

Nature of Proceeding: Motion for Relief

REQUEST TO CONTINUE HEARING WITH CONCURRENCE

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.

Reason for the continuance; both parties are attempting settlement.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: September 9, 2016

/s/ Joshua I. Goldman, Esquire

Joshua I. Goldman, Esquire
Attorney for Movant
BNY Independence Center
701 Market Street, Suite 5000
Philadelphia, PA 19106-1532
(215) 627-1322
Fax (215) 825-6406